

Dorea Silverman  
Attorney at Law  
80 Broad Street, Suite 1900  
New York, NY 10004

August 22, 2019

Hon. Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Larry Williams*, 02 Cr. 1372 (ALC)

Dear Judge Carter:

I write to update the Court on the status of my communications with representatives of the Bureau of Prisons (“BOP”) and, for the reasons discussed below, to respectfully ask the Court to order a second status update to be provided August 27, 2019.

The letter filed today by the government (“Gov. Ltr”) accurately sets forth the factual representations communicated to me by staff attorneys at the Metropolitan Correctional Center (“MCC”). Gov. Ltr. at 3 (ECF No. 541). Based on those representations, MCC staff appear to be working to facilitate Mr. Williams’ pre-release placement.

However, while forthcoming in some respects, the MCC staff attorneys have been unwilling to respond to questions regarding timing or to confirm whether certain steps have been completed. Specifically, no answers were provided to the following questions: whether the paperwork completed by the unit team has been provided to the warden for his review; how long it will take, approximately, for security reviews to be completed; whether a bed is presently available at a local halfway house; and whether Mr. Williams’ unit team has recommended him for placement on home confinement in addition to halfway house release.

Given BOP’s historical resistance to facilitating Mr. Williams’ pre-release placement absent judicial intervention<sup>1</sup>, the reticence of MCC staff attorneys to provide information about timing is concerning. To ensure that placement efforts continue, I respectfully ask the Court to order a second status report to be submitted Tuesday, August 27<sup>th</sup> that includes answers to the questions described above. If BOP cannot provide defense counsel with information concerning the timing of the security reviews, I respectfully ask the Court to require a BOP representative to

---

<sup>1</sup> As the Court is aware, BOP designated Mr. Williams only after the Court ordered the government to respond to Mr. Williams’ August 5, 2019 letter motion (ECF No. 535), and efforts to place Mr. Williams began only after the Court ordered the August 14, 2019 status conference.

provide the Court, *ex parte* and *in camera*, with detailed information about the security reviews, including how many have been completed and how many remain outstanding.

Respectfully submitted,

/s/

---

Dorea Silverman  
*Attorney for Larry Williams*

cc: AUSA Michael Maimin  
AUSA Margaret Graham  
Larry Williams